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November 11, 1996



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DOCKET FILE COPY ORIGINAL

Re: CC Docket No. 96-98 - Reply of PG&E to Opposition to its Petition for  
Reconsideration and Clarification

Dear Mr. Caton:

Enclosed for filing is an original plus fifteen (15) copies of Pacific Gas and Electric Company's "Reply of PG&E to Opposition to its Petition for Reconsideration and Clarification."

Please file-stamp/date-stamp a copy and return to us in the enclosed, self-addressed envelope.

Very truly yours,

  
SHIRLEY A. WOO

SAW:jab

cc: Interested parties in CC 96-98

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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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Implementation Of The Local  
Competition Provisions In The  
Telecommunications Act Of 1996

CC Docket No. 96-98

REPLY OF PACIFIC GAS AND ELECTRIC COMPANY TO  
OPPOSITIONS TO ITS PETITION FOR RECONSIDERATION  
AND CLARIFICATION

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Dated: November 11, 1996

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OPPOSITIONS TO ITS PETITION FOR RECONSIDERATION  
AND CLARIFICATION

Pursuant to Rule 1.429 of the Federal Communication Commission's ("Commission") Rules, Pacific Gas and Electric Company ("PG&E") hereby replies to oppositions and replies filed in this docket in response to PG&E's Petition for Reconsideration and Clarification of Commission Order FCC96-325. Specifically, PG&E takes issue with the California Cable Television Association's ("CCTA") position on the scope of the authority of the states to establish their own rules and requirements for state regulation of access, terms and conditions of telecommunication providers to poles, ducts, conduits and rights-of-way ("poles") under 47 U.S.C. Section 224, as amended by the 1996 Telecommunications Act ("TA96"). PG&E also responds to replies opposing the space reservation issues identified by PG&E in its Petition, and corrects an incorrect factual assumption regarding material from the California Public Utilities Commission's ("CPUC") on-going proceeding on rights-of-way access.

**I. STATES THAT ASSERT JURISDICTION AND REGULATE ACCESS, TERMS AND CONDITIONS FOR TELECOMMUNICATION PROVIDER ATTACHMENTS TO UTILITY RIGHT-OF-WAY FACILITIES ARE NOT REQUIRED TO COMPLY WITH THE FEDERAL COMMUNICATION COMMISSION ACCESS REQUIREMENTS FROM THE INTERCONNECTION ORDER.**

CCTA's opposition discusses several different issues associated with state regulation of access to poles and the rates, terms and conditions thereof, including arguing for state recertification under TA96 and acknowledging the freedom of states to set pole attachment rate formulae different from the federal method after certification under Section 224(c).<sup>1</sup> CCTA also accepts that a state may pre-empt the Commission on questions of access if the state regulates access. However, CCTA disagrees with PG&E on the scope of freedom the states have to establish their own access regulations even with pre-emption of the Commission. At its essence, CCTA's opposition postulates that state regulation of access should be required to meet "the prescribed federal minima outlined in the Interconnection Order" (CCTA Opposition, p.6). In other words, CCTA would require state regulation of access to incorporate the Commission established requirements in the Interconnection Order as a starting point.

PG&E maintains that CCTA's position is contrary to Section 224(c) and would impose conditions on certifying states'

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<sup>1</sup> Although petitions filed by other parties may have raised these specific issues, PG&E did not include those particular issues in its petition and will not reply to CCTA here. CCTA's Opposition also refers to California Public Utilities Code Section 767.5, which concerns cable television pole attachment rate issues. CCTA asserts that Section 767.5 applies to communication wire for cable companies, without distinction between video and telecommunications. PG&E does not believe that the Commission is the proper forum for this state law issue and anticipates the matter will be discussed in the appropriate California forum.

authority which go far beyond the Commission's jurisdiction. As noted in PG&E's petition, once a state has met the certification requirements of Section 224, the only portion of the Communications Act remaining applicable to state regulation of pole access, terms and conditions is Section 253's general prohibition against state or local regulation that "may prohibit or have the effect of prohibiting the ability of any entity to provide any interstate or intrastate telecommunications service." However, this section does not require certifying states' access regulations to meet any federal minimums from the Interconnection Order. Nor does anything in Section 224 subject state regulation of access, terms and conditions to any specific substantive federal standards or requirements. The statute leaves the states free to establish their own substantive rules as long as they consider 1) the interests of subscribers of the telecommunication service and 2) satisfy the enumerated procedural elements of Section 224(c)(3). Hence, the statutory scheme allows certifying states to adopt access rules which may contain very different requirements from the Commission's Interconnection Order.

PG&E believes that the Interconnection Order itself can fairly be interpreted as supporting PG&E's position. In Paragraph 1154, the Commission discusses situations where states have not asserted preemptive authority in accordance with Section 224(c). In that connection, Paragraph 1154 provides that federal rules will prevail where a local requirement conflicts with federal requirements. Of course, where a state does not assert preemptive authority under Section 224(c), the Commission retains jurisdiction and presumably can resolve conflicts. Thus, the

Interconnection Order only addresses conflicts between state and federal requirements where there is no state certification; it is silent on this question in the context of a certifying state. Although PG&E maintains that the statute itself gives certifying states the freedom to deviate from Commission access guidelines, the process of developing state rules would benefit from a clear Commission statement to that effect.

**II. ELECTRIC UTILITY DISTRIBUTION SYSTEM PLANNING OCCURS ON AN AREA BASIS RATHER THAN A SPECIFIC FACILITY BASIS. THE COMMISSION SHOULD NOT ADOPT REGULATIONS INTERFERING WITH THIS BASIC ELECTRIC UTILITY ACTIVITY AND SHOULD ALLOW ELECTRIC UTILITIES THE RIGHT TO CALL BACK CAPACITY FOR CORE ELECTRIC SERVICE PURPOSES.**

In its petition, PG&E alerted the Commission to the fact that electric utility distribution planning normally is based on a geographically defined distribution area, and is not specific to particular facilities within that area. For that reason, PG&E requested the Commission to allow electric utilities to reserve capacity on their own rights-of-way facilities consistent with their planning process. Other electric utilities also commented on the importance of permitting electric utilities to utilize their own capacity for future core electric service. Continental Cablevision, Inc., et al ("Joint Cable Parties") along with several other parties filed in opposition to PG&E and other electric utilities' concerns.<sup>2</sup>

None of the oppositions to PG&E's comments on capacity reservation address the issues as PG&E raised them. The

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<sup>2</sup> See CCTA Opposition to Petitions for Reconsideration and Clarification, footnote 1., p. 1.

Interconnection Order's approach to capacity reservation for electric utilities assumes that future electric distribution capacity needs can be identified on a specific facility basis. That is an erroneous assumption for an electric utility like PG&E. As stated in PG&E's comments, distribution system planning needs to occur on an area basis over a term of years, where the area is one served by distribution substations which are interconnected at the distribution voltage level (PG&E Comments, p. 7). Identification of specific poles or conduits does not normally occur until the need has materialized and the capacity addition is undergoing engineering for construction. In contrast, the facility specific approach in the Interconnection Order is totally inapposite to this process.

Since future distribution capacity needs are generalized in nature, PG&E has not objected to allowing telecommunication and CATV companies to attach to distribution poles where state safety and construction requirements permit. However, PG&E objects strenuously to the notion that the electric utility should be barred from calling back capacity when it is needed for an upgrade to the electric distribution system. PG&E's approach accommodates telecommunications providers' access to poles and minimizes the need to declare pole capacity unavailable now due to future capacity planning activities. At the same time, the electric utility's electric planning activities should be able to proceed on a basis consistent with the nature of electric distribution systems and the uncertainty over where and when load forecasts will materialize. Then, when the need for a distribution system upgrade is at hand, the capacity call back



can be limited to the facilities involved in the upgrade.

PG&E urges the Commission to recognize and accommodate electric distribution utility planning realities in its rules. To do otherwise would be to ignore electric utility distribution planning, tell the electric utilities they cannot have access to their own pole capacity when needed, and pre-empt their electric distribution needs for telecommunication use of capacity on right-of-way facilities, despite the fact the electric utilities have paid for and continue to maintain those facilities.

Moreover, no opposing party has responded to PG&E's point that denying the electric utilities call back rights will result in increased economic costs to society (PG&E Comments, pp. 8-9). For instance, electric utilities in California need conduit which is stronger and more deeply buried than required for telecommunication conduits. Consequently, installing additional electric conduit is much more expensive than placing more telecommunication conduit. If electric utilities effectively are denied the right to call back their electric conduit capacity when needed due to telecommunication attachments therein, the electric utility will need to invest in additional, expensive electric conduit.<sup>3</sup> This result makes no sense when the more efficient solution would be to require the telecommunication attachments to vacate the electric conduit and go into their own telecommunication conduit. For these additional reasons, PG&E maintains that the Commission must allow electric utilities to  
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<sup>3</sup> The same result can occur if telecommunication providers occupy capacity on overhead facilities which the electric utility needs to safely upgrade its electric lines.

call back capacity when it is actually needed to support construction of an upgrade to the electric system.

**III. THE JOINT CABLE PARTIES HAVE MISINTERPRETED THE EXERPT FROM THE CALIFORNIA PUBLIC UTILITIES COMMISSION'S TRANSCRIPT WHICH THEY ATTACHED TO THEIR OPPOSITION FILING.**

In their opposition, the Joint Cable Parties have incorrectly alleged that American Telephone and Telegraph (AT&T) and PG&E have entered into an agreement with a ten day response time for routine requests, with a maximum of 30 days (Joint Cable Parties Opposition, p. 13). Joint Cable Parties apparently have based their conclusion on an exerpt from an workshop transcript before the CPUC earlier this year (Joint Cable Parties Opposition, Attachment 3). That transcript page mentions an agreement between AT&T and "Pacific". There are a number of energy or telecommunication companies on the West Coast with the word "Pacific" in their names. The particular "Pacific" referenced in the Commission's transcript is not PG&E. PG&E does not have an agreement with AT&T on the subject in the transcript. PG&E believes the company referenced may be Pacific Bell. However, PG&E does not know whether the AT&T representative's assertions in the Commission's transcript are accurate or not. PG&E does know that the timeframes in the transcripts exerpts are totally inadequate for electric utility poles or poles with existing joint users for electric, telecommunications or CATV attachments.

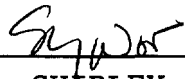
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WHEREFORE, PG&E requests the Commission to grant reconsideration and clarification of its Interconnection Order as requested in PG&E's comments.

Respectfully submitted,

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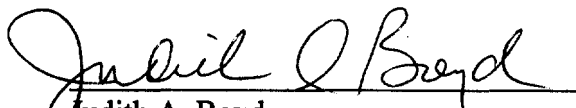
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document by mailing copies thereof first class, postage paid to each person designated on the official service list maintained by the Office of the Secretary and those interested parties in proceeding CC96-98.

Executed this 11th day of November, 1996, in San Francisco, California.

  
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